

WorkSource Information Notice 0042 – Public Comment and WCDD Responses

June 13, 2013

Name	Entity	Comments	WCDD Response
Patrick Malone	Community & Economic Development Unit - Washington State University Extension	<p>Upon review of your targets from the chart you included I note one rather critical component, that being the presence of a highly effective self-employment/microenterprise program with broad community visibility. Please note the exceptionally high response rate from Spokane – much higher than much larger areas. I believe this is entirely attributed to the comprehensive and highly effective Financial Assets program of the Spokane Neighborhood Action Programs (a CAP agency).</p> <p>For the past 6 years I and others at WSU Extension, in partnership with a diverse group of community organizations, have been working to build the microenterprise education and training capacity throughout the North and South Central, Eastern, and Benton-Franklin regions, but are still very short of creating the capacity possessed by SNAP. Therefore the relatively low number and percent of WIA enrollees listing self-employment as their training goal is completely expected. If the intent of the WCDD is to perpetuate this arrangement than projecting the current arrangement into the future should achieve that. If however, the WCDD desires to offer a full complement of employment and business ownership then we would invite WCDD staff support and assistance to grow effective self-employment/microenterprise education and training programs that rival SNAP's.</p> <p>For now, I do not have an alternative methodology but only a desire and hope that the future does not look like the present and that self-employment/microenterprise education and training programming is better structured and known throughout Central and Eastern WA.</p>	<p>Over the past year, WCDD has collaborated with WDCs and the Workforce Board to help increase the number of self-employment training providers on the Eligible Training Provider List (ETPL). Despite those efforts, and due to the limited level of self-employment training interest through WIA training, the availability of self-employment training providers on the ETPL is limited statewide. WCDD will continue to collaborate with WDCs and the Workforce Board to help increase the number of self-employment training providers on the ETPL to ensure there are adequate resources.</p> <p>WCDD will also continue to evaluate the effectiveness of this policy on an annual basis. In the meantime, WCDD encourages SNAP to provide information on how efforts can be aided in a manner that may help grow self-employment/microenterprise education and training that rival SNAP's.</p>

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Dave Gonzalez	South Central WDC	<p>South Central is questioning the baseline method used / proposed for PY13 self employment training. After reviewing the cohort of twelve participants we believe is being used to establish our target, we find the following. 1. six participants followed through with training as barbers, cosmetology, or commercial truck driver, which are reportable as self employment (independent contractors) under SKIES , however do not meet the definition of self employment under WIA policy 3705 and senate bill 6289. Five participants in the cohort indicated an interest in self employment, however chose another occupational track for training. Only one participant started a sole proprietorship after attending Perry Technical school for computer support tech. Based on this information, we do not feel that a target of 12 for self employment training as defined under WIA 3705 is realistic or attainable. Business start up training, which is the intention of the legislation, is further complicated because South Central does not have a local training provider currently in the region.</p>	<p>The rates proposed by WCDD were determined by capturing responses to the following question in SKIES: “Is Seeker’s goal Self Employment?” (see slide 7 in the SKIES Data Entry Instructions). All individuals that answered “Yes” were captured as part of the proposed self-employment demand target. This approach is consistent with the instructions attached to WIA Policy 3705 which are meant to capture the proportional share of self-employment training based on the articulated demand for such training from the universe of eligible WIA customers within specific regions.</p> <p>Although the six participants mentioned followed through with occupational skills training, which in and of itself does not meet the definition of self-employment, it is also important to point out that those individuals may still be considered as part of the demand target. If the individual’s goal is self-employment at the time of enrollment, the box in SKIES would be checked and it would then be assumed that the individual pursued occupational skills training with the goal of becoming self-employed. Individual Training Accounts (ITAs) alone do not represent the full spectrum of demand (page 2 of WIA Policy 3705).</p> <p>WCDD recognizes that the number of self-employment training providers on the ETPL is limited. WCDD will continue to collaborate with WDCs and the Workforce Board to help increase the number of self-employment training providers on the ETPL to ensure there are adequate resources to meet consumer demand.</p>
Mark Mattke	Spokane Area WDC	<p>I am writing to express serious concerns over the proposed targets for numbers of individuals to be served through self-employment that were released in the recent WIN. Locally, we are reviewing our data and the processes that may have contributed to the figure of 32 individuals expressing interest in self-employment. It is likely the result of changing participants’ goals to self-employment at exit or during follow-up even if this was not their original goal but it now reflects their employment status. An example would be if someone enters truck driving training and upon completion chooses to become an independent operator. This is a data entry issue and does not reflect a DW population that is overly-interested in self-employment at WIA intake. Simply put, this target is disproportionate to the entire rest of the state, doesn’t accurately represent the interests of our local</p>	<p>In response to the commenter’s concern, WCDD and Spokane WDC further researched local data available in SKIES. After careful consideration of unique local circumstances that resulted in data entry errors that altered participant goals after enrollment, WCDD has agreed to default to the baseline target set by the Self-Employment Assistance Program (SEAP). WCDD believes SEAP data is another valid source for determining the level of self-employment training interest per WDA.</p> <p>WCDD will also issue additional guidance regarding correct entry procedures to ensure interest in self-employment training is accurately captured at the time of enrollment. Interest in self-employment training is the key indicator required to comply with the provisions in Senate Bill 6289 as ITAs alone do not represent the full spectrum of demand (page 2 of WIA Policy 3705).</p>

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		<p>DW population, and as such is unattainable.</p> <p>Please let me know what the next steps are in the development process of this methodology so that we may work to arrive at a more reasonable target that will allow us to make appropriate use of our training resources.</p> <p>Thank you</p>	<p>While the target is used for planning purposes, WCDD recognizes that WIA customer choice principles may result in local areas not meeting planned targets or, in some cases, exceeding planned targets. WCDD will re-evaluate the effectiveness, along with the impact of this policy, on an annual basis in order to inform future legislation.</p>
Dave Petersen	North Central WDC	<p>1. The WIN directs WDCs to enroll a minimum number of persons into Entrepreneurial Training. This violates the consumer choice requirements at 663.440. WDCs have no authority to direct participants enroll in a specific type of training.</p> <p>2. A query of SKIES CY 2012 North Central participant data indicated 11 enrollees listed self-employment as a goal. However, only one PY12 YTD participant submitted an approved Entre Training application and was issued an Entre Training ITA. Until we can compare the participant folder records to the database for the eleven enrollees referenced, I think the majority are likely data entry errors or other mistakes.</p> <p>3. The Board has prioritized no specific occupation. The Fiscal Agent has no authority to reserve slots for potential, future Entre ITA applications and ignore existing completed applications.</p>	<p>The rates proposed by WCDD were determined by capturing responses to the following question in SKIES: “Is Seeker’s goal Self Employment?” (see slide 7 in the SKIES Data Entry Instructions). All individuals that answered “Yes” were captured as part of the proposed self-employment demand target. This approach is consistent with the instructions attached to WIA Policy 3705 which are meant to capture the proportional share of self-employment training based on the articulated demand for such training from the universe of eligible WIA customers within specific regions. This approach aligns with the provisions in Senate Bill 6289, which amends RCW 50.20.250.</p> <p>It is important to point out that someone that entered in occupational skills training may still be considered as part of demand for self-employment if this individual’s goal, as indicated by the data in SKIES, is to be self-employed at the time of enrollment. ITAs alone do not represent the full spectrum of demand (page 2 of WIA Policy 3705).</p> <p>WCDD will also issue additional guidance regarding correct entry procedures to ensure interest in self-employment training is accurately captured at the time of enrollment.</p>